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October 1, 2018

**VIA ECF**

Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
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Re: Ferdman v. CBS Interactive, 1:17-cv-01317 (PGG)

Dear Judge Gardephe:

We represent Plaintiff Steven Ferdman in the above-captioned case. In light of the Plaintiff's pending motion for reconsideration on the key issue of willfulness [Dkt. # 49], we write to respectfully request that the Court adjourn the deadlines concerning pre-trial submissions [Dkt. #48] until such time as the Court has decided Plaintiff's motion for reconsideration. Alternatively, Plaintiff respectfully requests leave of Court to file his pre-trial submissions according to the existing deadlines, but with the inclusion of the willfulness issue.

Defendant opposes the requested relief.

**MEMO ENDORSED**

The objection to adjourn the date for pre-trial submissions is denied. As to the content of those submissions -- and specifically whether willfulness is addressed -- the parties will include what they deem necessary under the circumstances.

Respectfully Submitted,

/richardliebowitz/  
Richard P. Liebowitz

Counsel for Plaintiff Steven Ferdman

**SO ORDERED:**

Paul G. Gardephe  
**Paul G. Gardephe, U.S.D.J.**

Oct 5, 2018